

HON. MARSHA PECHMAN

**UNITED STATES DISTRICT COURT WESTERN DISTRICT
OF WASHINGTON AT SEATTLE**

PAUL McTAGGART,
Plaintiff

vs.

ACE AMERICAN INSURANCE
COMPANY

Defendants

CAUSE NO. C12-1293 MJP

**DECLARATION OF SHANE CAREW IN
SUPPORT OF PLAINTIFF'S PETITION
FOR ASSESSMENT OF REASONABLE
ATTORNEYS' FEES**

I, Shane Carew, declare under penalty of perjury, that the following is true to
the best of my knowledge and belief:

1. I am over the 18 years of age, and I am competent to testify to the
matters herein

2. I am a solo practitioner, operating as Shane Carew P.S., d/b/a Carew
Law Office.

DECLARATION OF SHANE CAREW - 1

CAREW LAW OFFICE
5450 California Avenue SW, Suite 101
SEATTLE, WASHINGTON 98136
Telephone: (206) 587.0590
Fax: (206) 587.2388

1 3. Attached hereto as *Exhibit A* is a true and correct copy of my
2 Curriculum Vitae outlining my relevant education, training and legal experience. My
3 hourly rate for legal services is \$350.00.

4 4. I was retained to represent Mr. McTaggart in the above-referenced
5 lawsuit.

6 5. Carew Law Office has incurred a total of \$4,970.00 in fees and has
7 incurred no costs. Attached hereto as *Exhibit B* is a true and correct copy of the
8 invoice outlining Carew Law Office's work on this case. As reflected in the attached
9 invoice, the total number of hours billed were reasonable and necessary in order to
10 obtain remand.

11 6. I have been practicing maritime law in this community for 32 years. I am
12 familiar with the hourly rates of attorneys with similar levels of experience and
13 expertise in maritime matters. The rate of \$350 is at the low end of the range of fees
14 charged for such services.

15 7. In a case currently pending in King County in which I am involved,
16 *MWW, PLLC v. Kiribati Seafood Company, LLC*, No. 10-2-18839-8 SEA (King
17 County), attorneys from three different firms in Seattle with comparable experience to
18 the undersigned filed declarations that their respective reasonable hourly rates were
19 \$460 per hour (Lane Powell); \$475 per hour (Dorsey & Whitney), and \$665 per hour
20 (Perkins Coie).
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25 **DECLARATION OF SHANE CAREW - 2**

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Fax: (206) 587.2388

1 I hereby declare under penalty of perjury of the laws of the State of
2 Washington that the foregoing is true and correct.

3 Dated this 17th day of October, 2012.

4
5
6 /s/
SHANE C. CAREW, WSBA 10988
7 Attorney for Paul McTaggart
5450 California Ave. SW, Suite 101
8 Seattle, Washington 98136
Telephone: 206-587-0590
9 Fax: 206-587-2388
Email: shane@carewlaw.com
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13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on this date, I electronically served the foregoing
15 document with the Clerk of Court via the CM/ECF system upon all counsel of record
16 on October 17, 2012; as indicated below:
17

18 Rodney Fonda
19 Cozen O'Connor
1201 3rd Avenue, Ste. 5200
20 Seattle, WA 98101-3071
Email: rfonda@cozen.com
21 Via CM/ECF

22 /s/
CAROL HARLOW

23
24
25 **DECLARATION OF SHANE CAREW - 3**

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